

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:
PAUL R. CASTNER,

DEBTOR,

RONDA J. WINNECOUR, CHAPTER 13
TRUSTEE,

MOVANT,

VS.

PAUL R. CASTNER

RESPONDENTS.

CASE NO. 18-21827

CHAPTER 13

DOCUMENT NO. 104

RELATED TO DOC NO. 102

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES PAUL R. CASTNER, the Debtor in the above Chapter 13 case, by and through his attorney, Louis Pomerico, and files this Response to Trustee's Motion to Dismiss and in support thereof avers as follows:

1. Debtor's Chapter 13 Plan is in arrears in the amount of \$10,495.00 as of the date Trustee filed her Motion to Dismiss.
2. Debtor is awaiting receipt of guaranteed funds in the amount of \$15,000.00 in approximately 45 days.
3. At such time as Debtor receives the funds, the entire amount of \$15,000.00 will be paid to the Plan.
4. For the remainder of the Plan, Debtor will pay the sum of \$2,132.00 as his Plan payment.

5. At the remainder of his Chapter 13 Plan, the Debtor will pay the remainder of all arrearages, if any, at that time.

WHEREFORE, Debtor, Paul L. Castner, respectfully requests the Trustee not to dismiss this case, but allow the Debtor to cure the default without amending the Plan.

Dated: January 23, 2023

/s/ Louis Pomerico, Esquire
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